

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

GLOBAL PLASMA SOLUTIONS, INC.,

Plaintiff,

v.

**D ZINE PARTNERS LLC,
MARWA ZAATARI, and
ENVERID SYSTEMS, INC.,**

Defendants.

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CIVIL ACTION NO. 3:21-CV-00884-M

**DEFENDANTS D ZINE PARTNERS, LLC AND MARWA ZAAATRI'S AMENDED
NOTICE OF INTENT TO SERVE THIRD-PARTY LMS TECHNOLOGIES, INC. WITH
SUBPOENA *DUCES TECUM* TO APPEAR FOR RECORDS DEPOSITION AND TO
SERVE THIRD PARTY AL VATINE WITH SUBPOENA FOR A VIDEO DEPOSITION
FOR TRIAL PURPOSES**

NOTICE IS HEREBY GIVEN that, pursuant to Rules 26 and 45 of the Federal Rules of Civil Procedure, Defendants D Zine Partners, LLC and Marwa Zaatari ("Defendants"), by and through the undersigned counsel, will issue the attached Subpoena *Duces Tecum* (the Records Deposition Subpoena") directed to Third-Party LMS Technologies, Inc. which is located at 6423 Cecilia Circle, Edina, MN 55439 and they will issue the attached Subpoena ("Video Deposition Subpoena") to Third-Party Al Vatine- owner of LMS Technologies, Inc. to appear for a video deposition to be used for discovery or evidence at trial in this suit or both.

The Records Deposition Subpoena instructs Third-Party LMS Technologies, Inc. to appear for a records deposition at The Reserve – Edina located at 4951 West 77th Street, Edina, MN 55435 on December 23, 2022, at 9:00 a.m.

The Records Deposition Subpoena commands the custodian of records of Third-Party LMS Technologies, Inc. to produce and permit inspection and copying of the documents, electronically stored information, or tangible items listed in Exhibit A attached to the Subpoena *Duces Tecum* in LMS Technologies, Inc.'s possession, custody and control on or before December 23, 2023 at US Legal The Reserve – Edina located at 4951 West 77th Street, Edina, MN 55435.

The records deposition of LMS Technologies, Inc. will be upon oral examination before a certified court reporter authorized by law to administer oaths and shall be used for discovery or evidence at trial or both.

In lieu of appearance, LMS technologies, Inc. can complete the attached records affidavit attached to the Records Deposition Subpoena as Exhibit B and overnight the records on or before December 23, 2022 to the following counsel:

Bart F. Higgins, Esquire
Counsel for Defendant D Zine Partners, LLC and Marwa Zaatari
Shields Legal Group, PC
1600 Dallas Parkway, Suite 300
Dallas, Texas 75248

Kendal Reed, Esquire
Justin Hanna, Esquire
Counsel for Defendant enVerid Systems, Inc.
8080 Park Lane
Suite 700
Dallas, TX 75231

Addison Fontein
Counsel for Plaintiff Global Plasma Solutions, Inc.
McGuireWoods, LLP
2000 McKinney Avenue
Suite 1400
Dallas, TX 75201

The Video Deposition Subpoena instructs Third-Party Al Vatine to appear for a video deposition at The Reserve – Edina located at 4951 West 77th Street, Edina, MN 55435 on January 3, 2023, at 9:00 a.m. to be used for trial purposes.

The video deposition of Al Vatine will be upon oral examination before a certified court reporter and videographer authorized by law to administer oaths and shall be used for discovery or evidence at trial or both.

The oral examination of Al Vatine will continue from day to day until complete and will be recorded by both stenographic and video-graphic means. You are invited to attend and cross-examine.

Dated: December 16, 2022.

Respectfully submitted,

/s/ Bart F. Higgins

James D. Shields, SBN: 18260400

Bart F. Higgins, SBN: 24058303

David A. Shields, SBN: 24083838

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**ATTORNEYS FOR DEFENDANT
MARWA ZAATARI AND
D ZINE PARTNERS, LLC**

CERTIFICATE OF SERVICE

It is hereby certified that on December 16, 2022, a copy of the foregoing was served through the Court's electronic filing system as to all parties who have entered an appearance in this proceeding.

/s/ Bart F. Higgins

Bart F. Higgins